

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION OF MATTHEW B. MCGUIRE IN SUPPORT OF DEBTORS’
MOTION TO DESIGNATE WEST REALM SHIRES SERVICES, INC. AS PAYEE OF
FTX PHILANTHROPY, INC.’S DEPOSIT CLAIM AGAINST THE FDIC AS
RECEIVER FOR SIGNATURE BRIDGE BANK**

I, Matthew B. McGuire, hereby declare that the following is true and correct to the best of my knowledge, information and belief:

1. I am a member in good standing of the Bar of the State of Delaware and am admitted to practice before this Court. I am a partner of Landis Rath & Cobb LLP and am one of the attorneys representing FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors” and each a “Debtor”) in the above-captioned cases. I submit this declaration in support of the *Motion of Debtors to Designate West Realm Shires Services, Inc. as the Payee for FTX Philanthropy, Inc.’s Deposit Claim Against the FDIC as Receiver for Signature Bridge Bank* (the “Motion”), filed concurrently herewith, to place before the Court certain documents and information referred to in the Motion.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a letter dated March 10, 2023 that Luk Wai (Jen) Chan, the Treasurer of FTX Philanthropy, Inc. f/k/a FTX Foundation,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Inc. (“FTX Philanthropy”), sent on behalf of FTX Philanthropy to the General Counsel of Signature Bank requesting that Signature Bank wire all remaining funds in FTX Philanthropy’s bank account #8361 at Signature Bank to Debtor West Realm Shires Inc. Attached as Exhibit A to Ms. Chan’s letter is a true and correct copy of a resolution adopted by the Board of FTX Philanthropy at a meeting on February 21, 2022, pursuant to which Ms. Chan was elected the Treasurer of FTX Philanthropy. Attached as Exhibit B to Ms. Chan’s letter is a true and correct copy of a resolution adopted by unanimous consent of the Board of FTX Philanthropy on April 2, 2022 authorizing Ms. Chan to “open, maintain and close general and special accounts with any [banks or other financial institutions]” and “sign or countersign checks, drafts or other orders for payments” on behalf of FTX Philanthropy.

3. Attached hereto as **Exhibit 2** is a true and correct copy of an account statement for April 2022 for FTX Philanthropy’s bank account #8361 at Signature Bank, reflecting an April 28, 2022 wire transfer from Debtor West Realm Shires Services, Inc. (“WRSS”) to FTX Philanthropy in the amount of \$5,000,000.00.

4. Attached hereto as **Exhibit 3** is a true and correct copy of an account statement for May 2022 for FTX Philanthropy’s bank account #8361 at Signature Bank, reflecting (i) a May 23, 2022 wire transfer from Debtor WRSS to FTX Philanthropy in the amount of \$1,000,000.00; (ii) a May 23, 2022 wire transfer from Debtor WRSS to FTX Philanthropy in the amount of \$3,000,000.00; and (iii) a May 27, 2022 wire transfer from Debtor WRSS to FTX Philanthropy in the amount of \$10,000,000.00.

5. Attached hereto as **Exhibit 4** is a true and correct copy of an account statement for July 2022 for FTX Philanthropy’s bank account #8361 at Signature Bank, reflecting a July 22, 2022 wire transfer from Debtor WRSS to FTX Philanthropy in the amount of \$2,000,000.00.

6. Attached hereto as **Exhibit 5** is a true and correct copy of an account statement for October 2022 for FTX Philanthropy's bank account #8361 at Signature Bank, reflecting an October 24, 2022 wire transfer from Debtor North Dimension Inc. to FTX Philanthropy in the amount of \$20,000,000.00.

I declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in Wilmington, Delaware on this 11th day of January 2024.

/s/ Matthew B. McGuire
Matthew B. McGuire (No. 4366)